

James H. Barrett
Asst. Federal Public Defender
214 W. Lincolnway, Ste. 31-A
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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 13–CR-18-S
)	
THEODORE CHAPUT,)	
)	
Defendant.)	

MOTION FOR RELEASE ON BOND

COMES NOW the Defendant by and through his attorney, Assistant Federal Public Defender James H. Barrett and respectfully moves the Court for a hearing to determine terms and conditions under which he might be released on bond.

In so doing, counsel and the defendant would represent to the Court that he has no history of flight even though he has had these/similar charges pending in State court for more than a year. Additionally, he was admitted to bond during that period of time and was allowed to move

to the State of Colorado pending disposition of the State charges. During that entire period of time, the defendant was compliant with any and all conditions of bond and never violated his bond conditions which included regular telephone contact with his counsel and bondsman.

The defendant poses a risk of flight generally due to his lack of current contact with the State of Wyoming and his being unemployed although he does receive unemployment benefits. The defendant was resident in his RV in Colorado and is willing to retrieve his RV and return it and himself to Wyoming until this matter reaches disposition by plea or jury verdict.

This defendant poses no danger to the community. As stated earlier, he has been on bond on these charges in State Court since 2011 and there have been no police contacts or encounters nor have there been any complaints regarding inappropriate or criminal conduct.

If released, the defendant can and will make himself available to supervision in this District, will be available to counsel for review and consideration of his case and will be available for evaluation pending disposition of his case by plea or otherwise.

WHEREFORE, the defendant prays that this Court reconsider detention of this defendant and allow his release on bond.

DATED this 17th day of May, 2013.

Respectfully submitted,

WARREN R. WILLIAMSON
Federal Public Defender, Interim

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on the 17th day of May, 2013, upon the following by:

- ☐ e-mail
- ☐ hand delivery to USAO court box
- ☐ fax
- ☐ mail, postage paid
- ☒ electronic filing

_____/s/_____
James H. Barrett